

# **EXHIBIT C**

**THE COFFMAN LAW FIRM**  
A PROFESSIONAL CORPORATION  
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## **COFFMAN LAW FIRM RESUME**

The Coffman Law Firm is a litigation firm based in Beaumont, Texas that represents individuals and businesses across Texas and throughout the United States in complex commercial litigation, class actions and mass actions. The Firm's litigation practice is focused in the areas of antitrust, ERISA, data breach, theft of trade secrets, intellectual property, civil RICO, agriculture, consumer and other commercial disputes. For more information about the Coffman Law Firm and its attorneys, please visit the Firm website, [www.coffmanlawfirm.com](http://www.coffmanlawfirm.com).

Richard L. Coffman is a trial lawyer and the managing partner of the Coffman Law Firm. Mr. Coffman received his B.A. in Accounting, with highest honors, from Texas Lutheran University in 1978, and both his M.P.A. (Taxation), with honors, in 1980, and J.D. in 1989 from the University of Texas at Austin. Prior to establishing the Coffman Law Firm with his wife and law partner, Sonya B. Coffman, Mr. Coffman worked for a large defense firm in Houston and was a partner in a large plaintiff firm in Beaumont.

Mr. Coffman, who also is a Certified Public Accountant, worked with two international Big 8 public accounting firms. He also taught accounting courses as an adjunct member of the faculties of the University of Washington and University of Texas business schools. Mr. Coffman is AV peer-review rated by Martindale-Hubbell and admitted to practice in all Texas courts, the United States Supreme Court, the United States Court of Federal Claims and several federal district courts and circuit courts of appeal.

Mr. Coffman has significant national and regional class action and mass action leadership and logistic experience. Most recently, he was appointed one of the two Interim Co-Lead Counsel in MDL 2360; *In re: Science Applications International Corporation (SAIC) Backup Tape Data Theft Litigation* (D. D. C.). Mr. Coffman is also one of three interim co-lead class counsel appointed to represent the Financial Institution Track plaintiffs in MDL No. 2046; *In re Heartland Payment Systems, Inc. Customer Data Security Breach Litigation* (S.D. Tex.), a data breach case involving the theft of over 120 million credit and debit card numbers. The Heartland Payment Systems data breach is believed to be the largest data breach in history.

In non-data breach cases, Mr. Coffman currently is counsel for the Nevada indirect purchaser class representative in MDL No 1827; *In re TFT-LCD (Flat Panel) Antitrust Litigation* (N.D. Cal.), which recently settled for approximately \$1.1 billion. Mr. Coffman also represents one of the lead direct purchaser class representatives in MDL No. 1957; *In re Aftermarket Filters Antitrust Litigation* (N.D. Ill.) (price fixing). He also is co-counsel for the plaintiffs in *Quebedeaux v. United States*; Case No. 1:11-cv-00389-FMA (Ct. Fed. Cl.), an unconstitutional takings class action on behalf of business and property owners in a 4600 square mile area of the Atchafalaya River basin in south central Louisiana whose property and businesses were damaged

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and/or destroyed by floodwaters when the federal government opened the Morganza Spillway on the Mississippi River in May 2011.

In the recent past, Mr. Coffman was appointed to serve as co-lead class counsel in MDL No. 1921; *In re: Nissan North America, Inc. Odometer Litigation* (M.D. Tenn.) (defective odometers) and co-lead class counsel in *Wilson v. Texas Windstorm Insurance Association*; Cause No. 09-CV-0421 (56th Judicial District Court of Galveston County, Texas). The *Wilson* case was a class action and mass action on behalf of over 2000 property owners on Bolivar Peninsula in Galveston County, Texas, whose homes were completely destroyed by Hurricane Ike. Mr. Coffman and his co-counsel secured approximately \$175 million of additional insurance benefits for the *Wilson* property owners. Mr. Coffman also represented, as counsel of record or as of counsel, nine of the court appointed state indirect purchaser class representatives in MDL No. 1819; *In re Static Random Access Memory (SRAM) Antitrust Litigation* (N.D. Cal.), which settled for over \$41 million.

In the past, Mr. Coffman served as lead counsel or co-lead counsel in other national class actions, including MDL No. 1354; *In re Citigroup, Inc., Capital Accumulation Plan (CAP) Litigation* (D. Mass.) (forfeiture of earned compensation accumulated by securities brokers in an employee benefit plan); Cause No. 1:94CV65; *Robert Castro, Jr. v. PaineWebber, Inc.* (E.D. Tex.) (securities fraud involving a limited partnership investment); Cause No. 2:98CV3573; *Ronald E. Choinacki v. American Home Products Corporation* (D.N.J.) (underpaid lump sum pension benefits) and Cause No.: 9:97CV0087; *Belinda Myers-Garrison v. Johnson & Johnson* (E.D. Tex.) (underpaid lump sum pension benefits).

On the mass action front, Mr. Coffman currently represents over 900 Texas, Louisiana and Arkansas rice producers against Bayer CropScience for contaminating the U.S. long grain rice seed stock with genetically engineered rice in MDL No. 1811; *In re Genetically Modified Rice Litigation* (E.D. Mo.). This litigation recently settled for \$750 million. Along with co-counsel, Mr. Coffman represents (i) a group of pharmacies, dentists, churches and other medium sized to large businesses in connection with their BP oil spill claims, and (ii) a group of chain grocery stores and grocery wholesalers asserting individual price fixing claims against the major chocolate manufacturers in MDL No. 1935; *In re Chocolate Confectionary Antitrust Litigation* (M.D. Pa.). In the past, Mr. Coffman was co-lead counsel for a group of 200 chain drug stores and chain grocery stores with over 1100 retail locations that opted-out of MDL No. 997; *In re Brand- Name Prescription Drug Antitrust Litigation* (N.D. Ill.).

Mr. Coffman is also a founding member of the XDL Group, a virtual alliance of veteran trial lawyers and intellectual property professionals from five law firms who litigate intellectual property matters throughout the United States. See [www.xdlgroup.com](http://www.xdlgroup.com).

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Mr. Coffman is active in civic and charitable organizations, currently serving as Vice-Chairman of the Board of Beaumont Crime Stoppers. He is also an Executive Board member and Assistant Treasurer of the American Schools of Oriental Research (ASOR). Mr. Coffman will commence a three year term as ASOR Treasurer in January 2013.

Sonya B. Coffman is an accomplished trial lawyer and partner in the Coffman Law Firm. Ms. Coffman received her B.B.A. in Accounting, with highest honors, from the University of Memphis in 1978, and her J.D., with honors, from the University of Texas at Austin in 1989. Prior to establishing the Coffman Law Firm, Ms. Coffman worked for a large defense firm in Houston and was a partner in a large plaintiff firm in Beaumont.

Ms. Coffman is a Certified Public Accountant with Big 8 international public accounting experience. In addition to her commercial litigation practice, Ms. Coffman is Board Certified in Family Law by the Texas Board of Legal Specialization. She is admitted to practice in all Texas courts, the Eastern and Southern Districts of Texas and the Fifth Circuit Court of Appeals.

Ms. Coffman is also active in civic and charitable organizations, having served as a long time officer and/or director of the Symphony League of Beaumont, Julie Rogers Gift of Life, Neches River Festival and Beaumont Community Partners for Children.